

EXHIBIT C

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WISCONSIN**

SHANNON C. PRINCE,

Plaintiff,

Case No.: 2:18-CV-01465-DEJ

v.

APPLETON AUTO, LLC, *et al.*,

Defendants.

**DEFENDANTS' FIRST SET OF REQUESTS TO PLAINTIFF
FOR THE PRODUCTION OF DOCUMENTS AND THINGS**

TO: PLAINTIFF SHANNON C. PRINCE
c/o
Shannon D. McDonald, Esq.
MCDONALD & KLOTH, LLC
1818 N. Farwell Avenue
Milwaukee, WI 53202

Attorneys for Plaintiff.

Defendants, Appleton Auto, LLC, Applecars, LLC, and Robert Scott McCormick, by their attorneys and pursuant to Federal Rule of Civil Procedure 34, hereby request that Plaintiff, Shannon C. Prince, serve his responses in writing responses in writing and produce the documents and things in his possession, custody or control requested below for inspection and copying at the offices of Kohner, Mann & Kailas, S.C., Washington Building, Barnabas Business Center, 4650 N. Port Washington Road, Milwaukee, WI 53212-1059, within thirty days after being served with these requests.

DEFINITIONS AND INSTRUCTIONS

For purposes of these requests the following definitions and instructions shall apply:

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1. The term “Person” is defined as any natural person or any business, legal or governmental entity, or association.
2. “Employee” means any past or present director, officer, partner, employee, consultant, agent or representative.
3. “Prince” shall mean Plaintiff Shannon C. Prince, and any agent, Person or representative, including attorneys, acting on his behalf.
4. “You” or “Your” shall refer to Prince.
5. “AALLC” shall mean Defendant Appleton Auto, LLC, and any Employee, agent, Person or representative, including attorneys, acting on its behalf.
6. “Appleton Auto” shall mean Defendant Applecars, LLC, and any Employee, agent, Person or representative, including attorneys, acting on its behalf.
7. “McCormick” shall mean Defendant Robert Scott McCormick, and any agent, Person or representative, including attorneys, acting on his behalf.
8. “Defendants” shall refer to AALLC, Appleton Auto, and/or McCormick, interchangeably.
9. “The Litigation” shall refer to the case pending in the United States District Court for the Eastern District of Wisconsin, captioned *Shannon C. Prince v. Appleton Auto, LLC, et al.*, and bearing the Case Number 2:18-CV-01465 (DEJ).
10. “Amended Complaint” shall mean the Amended Complaint filed in the Litigation on January 28, 2019.
11. “Answer” shall mean refer to AALLC’s, Applecars’, and/or McCormick’s Answer to the Amended Complaint filed in the Litigation, interchangeably.

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12. The connectives “and” and “or” shall be construed both conjunctively and disjunctively.

13. “Any” and “all” shall each be construed as “any and all” and shall include “each” and “every.”

14. The terms “communication” and “document,” and the phrase “to identify” shall be defined as indicated in Local Rule 26(d).

15. “Relating to” means constituting, evidencing, or directly or indirectly mentioning, describing, referring to, pertaining to, being connected with or reflecting upon the stated subject matter.

16. The singular of any word shall include the plural, and the plural of any word shall include the singular.

17. If an objection is made to any request, state with specificity all grounds for the objection.

18. In the event that You refuse to respond, on the ground of privilege, to any request, identify the nature of the privilege that is being claimed.

19. Unless otherwise specified, these Requests concern the time period of January 1, 2017, to the date these Requests were served.

20. You must seasonably supplement Your responses and productions in response to these requests whenever necessary in accordance with Fed. R. Civ. P. 26(e).

REQUESTS

1. All Documents or things that You relied upon, referenced, reviewed, identified or were asked to identify in Defendants’ First Set of Interrogatories to Plaintiff.


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2. All Documents on which You base, or that relate to, the allegation in paragraph four of the Amended Complaint that Appleton Auto, LLC (misidentified as “Apple Auto, LLC”), is a d/b/a of Applecars, LLC.

3. All Documents on which You base, or that relate to, the allegations set forth in paragraphs 32-45 of the Amended Complaint.

4. All Documents You intend to use at trial to establish that one or more Defendants meets the definition of “employer” in 42 U.S.C. § 2000e(b).

Dated this 22nd day of April, 2019.

By: 

Ryan M. Billings
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Attorneys for Defendants Appleton Auto, LLC, Applecars, LLC, and Robert Scott McCormick

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CERTIFICATE OF SERVICE

I hereby certify that on April 22, 2019, I caused the above *Defendants' First Set of Requests for Production of Documents and Things to Plaintiff*, to be served upon the following counsel for Plaintiff Shannon C. Prince, by email:

Shannon D. McDonald, Esq.
MCDONALD AND KLOTH, LLC
1818 N. Farwell Ave.
Milwaukee, WI 53202
Telephone: (414) 403-2161
E-mail: sdm@themklaw.com

Ryan M. Beilings